

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOANNA WILSON,)	
)	
Plaintiff,)	Case No.: 1:23-cv-06886
)	
v.)	
)	
COOK COUNTY, YASER HAQ, M.D.,)	Honorable Andrea R. Wood
STEVE PASCHOS, M.D., AHLEA C.)	
BALAWENDER PA-C, MICHAEL)	
BEDNARZ, M.D., JASON SPRAGUE,)	
LAUREN CARTWRIGHT, and NIKKI)	
RUFFIN,)	
)	
Defendants.)	
)	
)	
)	

AGREED MOTION FOR ENTRY OF A QUALIFIED PROTECTIVE ORDER

Defendants, COOK COUNTY, YASER HAQ, M.D., STEVE PASCHOS, M.D., AHLEA C. BALAWENDER PA-C, MICHAEL BEDNARZ, M.D., JASON SPRAGUE, LAUREN CARTWRIGHT, and NIKKI RUFFIN, by and through their attorneys, DeVore Radunsky, LLC and Plaintiff, JOANNA WILSON (“WILSON”), by her attorney, Jim Pullos of Clifford Law Offices, and pursuant to FRCP 26 (c), and 45 CFR § 160.103 and 164, move this court to enter a Qualified Protective Order:

1. According to her Complaint, Wilson, as Independent Administrator of the Estate of Areon J. Marion, claims that on October 31, 2021, Marion’s constitutional rights were violated when Marion committed suicide while housed at the Cook County Jail in 2021.

2. This discovery is expected to include protected health information (“PHI”) as defined by 45 C.F.R. §§ 160.103.

3. HIPAA and its implementing regulations prohibit “covered entities,” including medical care providers, from disclosing PHI in judicial proceedings other than by authorization or qualified protective order. 45 C.F.R. § 164.512(e).

4. In order to protect Plaintiff’s confidential and personal records, pursuant to 45 C.F.R. § 160.103 and 164, the parties respectfully request that this Court enter a Qualified Protective Order so that plaintiff’s medical records and related medical information may be obtained.

5. In accordance with Your Honors standing order, the proposed qualified protective order has been emailed to Proposed_Order_Wood@ilnd.uscourts.gov contemporaneously with the filing this motion.

Wherefore, Defendants, COOK COUNTY, YASER HAQ, M.D., STEVE PASCHOS, M.D., AHLEA C. BALAWENDER PA-C, MICHAEL BEDNARZ, M.D., JASON SPRAGUE, LAUREN CARTWRIGHT, and NIKKI RUFFIN, and Plaintiff, JOANNA WILSON, respectfully request that this Court enter the Qualified Protective Order on behalf of the Plaintiff.

Respectfully submitted,

/s/ Troy S. Radunsky
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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he electronically filed the foregoing document on May 24, 2023, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/ Troy S. Radunsky
Troy S. Radunsky, One of the Attorneys
For the Defendants

PLAINTIFF'S COUNSEL

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